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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE NAVIENT CORPORATION
SECURITIES LITIGATION

Case No. 1:17-cv-08373-RBK-AMD

**DECLARATION OF DANIELLE
J. MCCALL IN SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S SECOND
AMENDED COMPLAINT**

Motion Day: August 5, 2019

I, Danielle J. McCall, hereby certify pursuant to 28 U.S.C. §1746 that:

1. I am an Associate of the law firm of Latham & Watkins LLP, 555 Eleventh Street, NW, Suite 1000, Washington, DC 20004-1304, attorneys for Defendants Navient Corporation (“Navient”), John F. Remondi, Somsak Chivavibul, and Christian M. Lown (collectively, “Defendants”). I am admitted to the New Jersey State Bar, and I am submitting this declaration in support of the Defendants’ Motion to Dismiss Plaintiff’s Second Amended Complaint (Dkt. 36; “Motion”).

2. On November 20, 2018, Politico Pro published an article entitled “Warren presses Navient on internal Education Department review” (“Politico Pro Article”). Attached as **Exhibit 9** is a true and correct copy of the Politico Pro Article, as available to Politico Pro subscribers at <<https://subscriber.politicopro.com/article/2018/11/warren-presses-navient-on-internal-education-department-review-986790>>, and as referenced in Defendants’ numerous filings prior to and in support of the Motion. **Exhibit 9** discusses and provides a direct link to a document it describes as “a lengthy statement” by the Department of Education regarding the report issued by its Office of Federal Student Aid (“FSA Review”) referenced in Plaintiff’s Second Amended Complaint ¶¶ 92-95, 173-76, 179-83 (D.I. 33, “SAC”), and characterizations of the FSA Review made

in Senator Elizabeth Warren's November 13, 2017 letter to Navient CEO, Jack Remondi, referenced in SAC ¶¶ 168-70.

3. Attached as **Exhibit 10** is a true and correct copy of the Department of Education statement ("ED Statement") that was available through the embedded link in the Politico Pro Article appended here as **Exhibit 9**. The ED Statement was obtained by Defendants through the Politico Pro web platform at <<https://subscriber.politicopro.com/f/?id=00000167-3332-d6f7-adf7-737b474b0001>> and **Exhibit 10**, to which the page title, URL, and Politico Pro footer have been added, is appended to this Declaration in a form authenticated by Politico Pro.

4. I have reviewed the ED Statement obtained directly from Politico Pro and appended hereto as **Exhibit 10**. I hereby aver that it is identical to the statement attributed to the Department of Education in **Exhibit 7**, the text of which is publicly available on Navient's website at <https://news.navient.com/static-files/5afa1bd9-0a8a-4e4f-83e6-74a736c8b80d> (last visited July 29, 2019).

Executed on the 29th day of July, 2019.



Danielle J. McCall
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